

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: THE ALLSTATE CORPORATION  
SECURITIES LITIGATION

Case No. 16-cv-10510  
Hon. Beth W. Jantz

**DECLARATION OF KENNETH L. SCHMETTERER IN SUPPORT OF  
MOTION TO EXCLUDE TESTIMONY OF JOHN D. FINNERTY**

Pursuant to 28 U.S.C. § 1746, Kenneth L. Schmetterer declares:

1. I am a member in good standing of the Bar of this Court and a member of DLA Piper LLP (US), counsel in this action for defendants The Allstate Corporation (“Allstate”), Thomas J. Wilson, and Matthew E. Winter.
2. I submit this declaration to place before the Court true and correct copies of certain materials that may be considered in connection with defendants’ motion to exclude the testimony and opinions of proposed expert John D. Finnerty. These materials were retrieved under my direction and supervision or under the direction and supervision of my colleagues.
3. Attached as Exhibit A is the expert report of John D. Finnerty, which was served by the plaintiffs in this action on February 27, 2020.
4. Attached as Exhibit B is the expert reply report of John D. Finnerty, which was served by the plaintiffs in this action on July 30, 2020.
5. Attached as Exhibit C is the condensed version of the transcript of the deposition of John D. Finnerty, taken in this action on September 30, 2020.

6. Attached as Exhibit D is a transcript of a conference call with securities analysts hosted by Allstate on February 6, 2014, which was retrieved from the website maintained by S&P Capital IQ.

7. Attached as Exhibit E is a transcript of a conference call with securities analysts hosted by Allstate on May 6, 2015, which was retrieved from the website maintained by S&P Capital IQ.

8. Attached as Exhibit F is an earnings release issued by Allstate on August 3, 2015, which was retrieved from Allstate's investor relations website.

9. Attached as Exhibit G is a transcript of a conference call with securities analysts hosted by Allstate on August 4, 2015, which was retrieved from the website maintained by S&P Capital IQ.

10. Attached as Exhibit H is what I understand based on information available to me a true and correct copy of an analyst report concerning Allstate issued by Bank of America Merrill Lynch on August 4, 2015, which was retrieved from Allstate's files, where it was kept in the regular and ordinary course of Allstate's business.

11. Attached as Exhibit I is an analyst report concerning Allstate issued by Sandler O'Neill on August 5, 2015, which was retrieved from a website maintained by Thomson Reuters.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information.

Executed this 4th day of March, 2021.



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Kenneth L. Schmetterer